



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 25, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

John Isaf  
7 Frost Street  
Natick, MA 01760

RE: MUR 3774

Dear Mr. Isaf:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena which requires you to appear and give sworn testimony on May 28, 1997, at 999 E Street, NW, Washington, DC, Sixth Floor, and which requires you to produce certain documents, in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

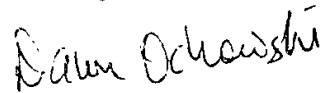
You may consult with an attorney and have an attorney present with you at the deposition. You may also have an attorney assist you in the preparation of your responses to this subpoena. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition. However, you are required to submit the information within 30 days of your receipt of this subpoena.

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Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$40.00. Subsequent to the deposition, you will be sent a check for the witness fee and mileage. Arrangements for your travel to Washington, DC will be discussed with you shortly by telephone.

Within two days of your receipt of this notification, please confirm your scheduled appearance with me at (800) 424-9530.

Sincerely,



Dawn Odrowski  
Attorney

Enclosure  
Subpoena

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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)  
)

MUR 3774

**SUBPOENA**

TO: John Isaf  
7 Frost Street  
Natick, MA 01760

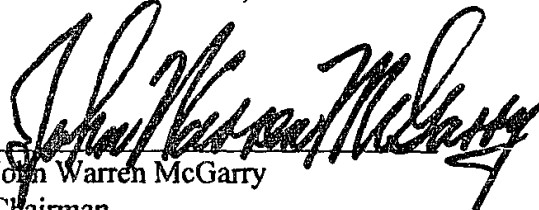
Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to the American Defense Institute/American Defense Foundation's Military Voter Program. Notice is hereby given that the deposition is to be taken on May 28, 1997 at 999 E Street, NW, Washington, DC, Sixth Floor in beginning at 9:00 am and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, by the close of business on May 15, 1997.


John Isaf  
MUR 3774  
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his  
hand in Washington, D.C. on this *25<sup>th</sup>* day of April, 1997.

For the Commission,

  
John Warren McGarry  
Chairman

ATTEST:

  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Document Request

### **INSTRUCTIONS**

In answering this request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference to another exhibit attached to your response.

If, after exercising due diligence to locate all documents responsive to a request in this subpoena, you are unable to locate any such documents, please provide a written statement to this effect at the time you produce documents responsive to other requests in the subpoena. The statement should describe what actions you took in attempting to locate responsive documents

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1992 to July 31, 1993.

The following requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation, if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

### **DEFINITIONS**

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named person to whom these discovery requests are addressed.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, faxes, electronic mail, calendars, diaries, log sheets, records of telephone communications, fax logs, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

### DOCUMENT REQUESTS

1. Produce all documents in your possession or control that in any way contain, or refer or relate to, the Military Voter Program ("MVP") of the American Defense Foundation and/or the American Defense Institute in 1992 and 1993. Such documents should include, but not be limited to, drafts and final versions of candidate questionnaires and direct mail materials, videos, scripts for public service announcements, press releases, appointment books, calendars or other such documents which reflect meetings concerning the MVP, telephone messages, faxes, notes, and correspondence including any with military base public affairs officers or other base personnel.
2. Produce all documents in your possession or control that in any way contain, or refer or relate to, communications or meetings in 1992 and 1993 between the American Defense Foundation and/or the American Defense Institute and the National Republican Senatorial Committee ("NRSC"), its employees or agents, concerning MVP activities or a federal election generally. Such documents should include, but not be limited to, appointment books, calendars or other such documents which reflect any such communications or meetings, correspondence, memoranda, faxes, notes, or telephone messages, candidate questionnaires and direct mail materials.

3. Produce all documents which in any way contain, refer or relate to, information regarding 1992 and 1993 communications or meetings between the American Defense Foundation and/or the American Defense Institute and each of the persons and committees listed below concerning MVP activities or federal elections generally. Such documents should include, but not be limited to, appointment books, calendars, memoranda, faxes, notes, telephone messages, candidate questionnaires, and direct mail materials.

- a. Lauch Faircloth and any officer, employee, or consultant of his 1992 Senate campaign
- b. Thomas Hartnett and any officer, employee, or consultant of his 1992 Senate campaign
- c. Michael DeWine and any officer, employee, or consultant of his 1992 Senate campaign
- d. Dirk Kempthorne and any officer, employee, or consultant of his 1992 Senate campaign
- e. Robert Packwood and any officer, employee, or consultant of his 1992 Senate campaign
- f. Paul Coverdell and any officer, employee, or consultant of his 1992 Senate campaign
- g. Robert Kasten and any officer, employee, or consultant of his 1992 Senate campaign

4. Produce all documents which in any way contain, or refer or relate to, information regarding 1993 communications or meetings between the American Defense Foundation and/or the American Defense Institute and the persons and committees listed below concerning MVP activities or federal elections generally. Such documents should include, but not be limited to, appointment books, calendars or other such documents which reflect any such communications or meetings, correspondence, memoranda, faxes, notes, telephone messages, candidate questionnaires and direct mail materials.

- a. Kay Bailey Hutchinson and any officer, employee, or consultant of her 1993 Senate campaign

- b. Joe Barton and any officer, employee, or consultant of his 1993 Senate campaign
- c. Jack Fields and any officer, employee, or consultant of his 1993 Senate campaign
- d. Robert Krueger and any officer, employee, or consultant of his 1993 Senate campaign
- e. Richard Fisher and any officer, employee, or consultant of his 1993 Senate campaign
- f. James Mattox and any officer, employee, or consultant of his 1993 Senate campaign